State of **FLORIDA**
County of Palm Beach

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 26th day of February, 2025 by Dorothy Bronert, who ☐ is personally known to me or ☒ produced a Florida driver's license as identification, regarding the attached instrument described as witness statement and to whose signature this notarization applies.

SEAL

HELENA NOOT
MY COMMISSION # HH 656646
EXPIRES: October 31, 2028

Helena V. Noot
notary public signature

Helena V. Noot
notary public printed name

FL-2001-NEK

www.NotaryPL.com provides this form pursuant to Florida Statutes §695.26(1), §117.05(13)(b)

DOROTHY GROENERT

WITNESS STATEMENT

1. I, Dorothy Groenert, am the biological mother of the late Carolyn Andriano. I currently reside in West Palm Beach, Florida. The facts in this statement come from my personal experience, knowledge, and from conversations I had with my daughter (furthermore referred to as 'Carolyn') relating to her involvement with Jeffrey Epstein and his former associates, and the subsequent legal cases that ensued.

2. Carolyn was born on the 2nd January, 1987.

3. I maintained a close and loving relationship with Carolyn until her tragic and suspicious death - Carolyn died in a hotel room at the DoubleTree by Hilton in West Palm Beach, Florida, on May 23rd, 2023; I will make clear my belief as to how she died further into this witness statement. I believe that she was murdered.

4. Carolyn lived with me in my home in West Palm Beach during the whole period that she was involved with Mr. Jeffrey Epstein (furthermore referred to as 'Epstein').

5. In 2002, Carolyn met Virginia Roberts (now 'Virginia Giuffre' – furthermore referred to as 'Virginia').

6. My daughter Carolyn met Virginia when Carolyn was legally classed as a minor in the state of Florida, and Virginia was over the age of eighteen and thus a legal adult. Virginia was relatively sophisticated, mature, and owned her own car. Carolyn was very much impressed, overawed, and manipulated by Virginia.

7. It is already an established fact that Virginia, a legal adult, groomed and recruited Carolyn (fully aware that Carolyn was still under the legal age of consent), and that she supplied Carolyn with drugs. I blame Virginia for Carolyn's future drug addiction.

8. Virginia, a legal adult, willingly groomed and recruited my underage daughter in exchange for money from Epstein.

9. Virginia achieved this by manipulating Carolyn and offering to take her to meet a 'rich friend', i.e. Epstein, to provide him with a sexualised massage in exchange for cash.

10. Carolyn already had a developed figure that could have led people to believe she was over the legal age of consent. Virginia coerced Carolyn into lying about her age so that Epstein and members of his staff would believe she was over the legal age of consent (eighteen) in the state of Florida, and also provided Carolyn with clothes that Carolyn described as 'skimpy', and makeup, to make her appear even older than she actually was.

11. Whilst driving her to Epstein's home, Virginia again frequently reminded Carolyn to lie to Epstein and his members of staff if they inquired about her age, and to tell them that she was over 18.

12. Virginia and Carolyn told me at the time that they were hired by Epstein to clean his home in West Palm Beach and to waitress at some of his private dinner parties and private functions.

13. At the time, I was also legitimately making a living cleaning the homes of wealthy people in the West Palm Beach area, and Carolyn had worked with me on numerous occasions – therefore I did not suspect anything improper was taking place.

14. Carolyn did not at the time claim to me that she had been engaging in any sexual or otherwise illegal activity with Epstein, Sarah Kellen or Ghislaine Maxwell. It was not until many years later, when FBI agents arrived at my home to speak to Carolyn, that Carolyn informed me she had been sexually abused by Epstein.

15. I now know from newspaper sources that when Virginia took Carolyn to see Epstein for the first time, Carolyn was made to sit on a sofa and watch whilst Virginia climbed on top of Epstein and engaged in sexual intercourse with him.

16. During the majority of the period that she was acquainted with Epstein, Carolyn did not own her own personal mobile phone. If someone needed to contact her, they would contact my personal mobile phone instead.

17. The majority of phone calls made to my phone for Carolyn at this time were made by Epstein's assistant, Sarah Kellen. During these phone calls, Kellen would ask if Carolyn was available to serve at one of Epstein's private dinner parties or functions.

18. I feel sorry for Prince Andrew of England because I believe he has been falsely accused by Virginia. I'm certain that Carolyn did not, as she later claimed, receive text messages from Virginia claiming Virginia had engaged in sexual activity with Prince Andrew. As I have already stated, Carolyn did not possess a mobile phone at the time, was using my mobile phone, and it is a fact that no such texts from Virginia were ever sent to my mobile phone.

19. Carolyn gave birth to her first child on the 21st March, 2004.

20. In 2008, Carolyn joined a lawsuit against Epstein and his associate, Sarah Kellen, alleging sexual abuse whilst she was a minor. The lawsuit was filed by attorneys Bradley Edwards and Jack Scarola, who both also represented other Epstein accusers, including my daughter's recruiter, Virginia Giuffre. This lawsuit was settled in 2010 for an undisclosed sum.

At no point in this lawsuit did Carolyn name Ghislaine Maxwell or accuse Ghislaine Maxwell of having any involvement in her recruitment or abuse.

21. In October 2020, Carolyn was again represented by attorney Jack Scarola. Scarola provided her with legal counsel and support with the aim to obtain further compensation from Epstein for illegally engaging in sexual activity with her whilst she was a minor. Scarola had also legally represented Virginia, Carolyn's recruiter. At no point in this legal endeavour with Scarola representing her did Carolyn name Ghislaine Maxwell, nor did she accuse Ghislaine Maxwell of having any involvement in her recruitment or abuse.

22. In the same year (2020, the year following Epstein's death in prison), Carolyn was awarded $3.25m from the Epstein Victims' Compensation Program (EVCP), minus the undisclosed settlement amount paid to her by Epstein in 2010. Due to Carolyn's ongoing brave battle against drug addiction, this money was placed in a trust account and controlled by Legal Administrator/Paralegal Michael Danchuk because she was still bravely battling the drug addiction that Virginia was partly responsible for inflicting upon her.

23. In 2021, Carolyn was asked to be a prosecution witness in the trial of Ghislaine Maxwell. Carolyn was legally represented by Maureen Comey and legally supported by Michael Danchuk and Jack Scarola. It is an established fact, however, that during the trial all prosecution lawyers representing the numerous witnesses worked in close cooperation with each other. Those lawyers included David Boies, Sigrid McCawley, and Bradley Edwards.

24. Carolyn was uncomfortable with lawyers representing her at the same time as representing her recruiter and abuser, Virginia Giuffre.

25. In return for her cooperation, however, [redacted] promised to pay my daughter, Carolyn, a large sum of money. It was proposed by [redacted] that this money would be paid by Virginia, taken out of the compensation that Virginia had obtained from Epstein, to represent an 'apology' of sorts for Virginia recruiting her. In return, Carolyn would have to make certain statements to corroborate claims made by Virginia and others against Prince Andrew of England and against Ghislaine Maxwell.

26. At the time of having Carolyn provide testimony for the trial of Ghislaine Maxwell, prosecution lawyers representing Carolyn and other alleged victims of Epstein were aware that Carolyn was battling a drug addiction – an addiction that was instigated by Virginia.

27. It is my belief that Carolyn was given access to drugs to keep her impressionable and to manipulate her into making false statements to help corroborate the claims made by the lawyers' other client, Virginia.

28. It is my belief that Prince Andrew is innocent and that the allegations made against him by Virginia Giuffre are false.

29. I am convinced that Virginia and her collaborators saw Prince Andrew as a money pot, a member of an institution that is renowned for seeking to avoid court rooms and negative press at all costs, and therefore invented accusations against him with the knowledge that he was an 'easy target' who was highly likely to be pressured into financially settling Virginia's lawsuit against him out of court.

30. After promising to give her a large sum of money in exchange for her testifying during Ghislaine Maxwell's trial, Virginia and reneged on this promise and Carolyn did not receive any payment from them.

31. In January 2022, Stephen Wright from the British newspaper The Daily Mail, contacted Carolyn, interviewed her, and published an article about her story regarding Epstein and Virginia.

32. The article is correct in some detail but was spun to promote Virginia as a hero. Virginia is not a hero, she was a willing procurer and child trafficker who belongs in prison for what she, as a legal adult, did to my underage daughter. Virginia introduced my daughter to drugs and groomed her to send her to Epstein for financial gain. It is also an established fact that Virginia also recruited other underage girls by hanging about outside schools. The real Virginia, the Virginia whom my daughter knew, is a child procurer and child trafficker who has openly admitted to having, whilst being a legal adult, groomed and recruited a number of underage girls to participate in illegal sexual activity. Virginia was Epstein's most prolific recruiter, grooming and manipulating underage girls for financial gain and coercing them to lie to Epstein and his associates that they were over 18 so that she could essentially sell them to Epstein. However, with the cooperation of lawyers who have carefully choreographed her image on television, in the press, and in lawsuits, Virginia has managed to turn others, including Ghislaine Maxwell, into scapegoats for the crimes that she, Virginia, in fact herself committed.

33. Right until just one week before her untimely death, Carolyn told me that she wished to launch lawsuits against Virginia, Virginia's lawyers, and Sarah Kellen – Kellen and Virginia for helping to procure her for Epstein whilst she was still a minor, and the lawyers for, along with Virginia, coercing her in exchange for financial compensation that was later reneged on.

34. It is significant to note that, despite the evidence she was coerced into providing in court, Carolyn did not state to me that she wanted to sue Ghislaine Maxwell.

35. The full details surrounding my daughter's tragic death have still not been revealed, and it is my personal opinion that Carolyn did not die of an accidental drug overdose. I want a full inquiry into her death,

36. I have made numerous requests to the police force that handled the case, including requesting bodycam footage from the officers who attended the scene of my daughter's death. These requests have been ignored.

37. Carolyn's ex-husband, John Pitts Jr. was with Carolyn at the time of her death, and the police have not carried out an investigation into his role in the incident.

38. Very quickly after her death, John Pitts Jr. had my daughter cremated, without my knowledge or consent. He also sold off her home and made a significant financial gain as the result of her death. I do not agree with the autopsy report's conclusion that Carolyn died of an accidental overdose. The evidence I hold, including drug test results from the time, show that Carolyn was making a recovery and was following the drug rehabilitation program that I was helping her with.

39. The possibility that Carolyn was intentionally given an overdose against her will, i.e. that she was murdered, has not been investigated and has not been ruled out.

40. I want justice for my daughter. Not only have the wrong people been prosecuted, but individuals like Virginia, whose guilt is well-established and self-confessed, have disgracefully been rewarded with millions of dollars and public praise. They are criminals who would, if 'real' justice were served, now be behind bars.

SIGNED: Dorothy Groenert

Dorothy Groenert

DATED: 2/26/25